

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

UNITED STATES OF AMERICA

v.

GREG E. LINDBERG,

Defendant.

No. 5:19-CR-22-MOC

No. 3:23-CR-48-MOC

**DEFENDANT GREG E. LINDBERG'S CONSENT MOTION FOR A STATUS
HEARING**

Defendant Greg E. Lindberg, through undersigned counsel, and with the consent of the United States, respectfully moves the Court to schedule a status hearing in this matter, with the inclusion of the Special Master who is working on determining, and will make a recommendation to the Court regarding, the total amount of victims and restitution payments required in this matter. In support of this Motion, Mr. Lindberg sets forth the following facts:

1. On May 16, 2024, Mr. Lindberg was found guilty on Count 1 and Count 2 of the Indictment in Case No. 5:19-cr-22.
2. Thereafter, on November 12, 2024, Mr. Lindberg pled guilty to Count 1 and Count 13 in Case No. 3:23-cr-48.
3. Also on November 12, 2024, Mr. Lindberg voluntarily surrendered to begin serving his federal sentence. Mr. Lindberg is currently incarcerated at the Gaston County Jail.
4. On June 17, 2025, the final Presentence Report was filed in connection with Case Nos. 5:19-cr-22 and 3:23-cr-48.
5. The parties are jointly recommending that Mr. Lindberg be sentenced in both matters at a consolidated sentencing hearing. Moreover, provided that Mr. Lindberg meets certain requirements relating to the payment of restitution and cooperation with the Special Master, the

United States has agreed to recommend, *inter alia*, that the sentence imposed in Case No. 3:23-cr-48 run concurrently with the sentence imposed in Case No. 5:19-cr-22.

6. On January 23, 2025, the Court entered an Order appointing Joseph Grier of Grier Wright Martinez, P.A. as Special Master in this case to, *inter alia*, determine the amount of restitution owed by Mr. Lindberg, identify assets available for liquidation for the benefit of victims, and help accomplish the liquidation of assets and the payment of available funds to victims.

7. Since the date of the Special Master Order, the parties have been working diligently (including the holding of weekly coordination calls) with the Special Master, the Special Master's Financial Advisor (Paladin), and other entities and victim representatives. Among other things, the Special Master has been working diligently on closing the sale of an initial primary restitution asset that will generate significant restitution payments for victims and victim entities and collecting information from victims for the purpose of making a recommendation to the Court regarding the total amount of restitution. The Special Master recently filed a motion seeking the Court's approval for the sale of the initial Primary Restitution Asset. *See* Dkt. Entry No. 66. The Special Master has also filed his First Report regarding his efforts since his services were authorized by this Court. *See* Dkt. Entry No. 65. As can be seen from the Special Master's First Report, the Special Master's duties involve numerous complexities due to existing state court litigation, the nature of the assets involved in the potential asset sales, and victim restitution calculation intricacies.

8. The parties are jointly recommending that the sentencing hearing in this case be delayed until after the Special Master submits recommended total restitution amounts to the Court. The sentencing hearing in this case could be lengthy given the complexity of prior proceedings and the restitution aspects of this matter. The parties will have a better sense of those issues (and

thus how much time it is anticipated that the Court will need to address them) once the Special Master has completed his recommendation.

9. Mr. Lindberg respectfully requests that the Court schedule a status hearing in August or thereafter to discuss the above issues. Mr. Lindberg recommends that the Special Master attend this hearing, in addition to prosecution and defense counsel.

10. The United States consents to the granting of this Motion.

11. A proposed Order is being submitted contemporaneously with the filing of this Motion.

This, the 10th day of July, 2025.

Respectfully submitted,

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ARTIFICIAL INTELLIGENCE CERTIFICATION

Pursuant to the Court's June 18, 2024 Standing Order, which was published to the Bar of the Western District of North Carolina on June 27, 2024, the undersigned hereby certifies:

1. No artificial intelligence was employed in doing the research for the preparation of this document, with the exception of such artificial intelligence embedded in the standard online legal research sources Westlaw, Lexis, FastCase, and Bloomberg;
2. Every statement and every citation to an authority contained in this document has been checked by an attorney in this case and/or a paralegal working at his/her direction as to the accuracy of the proposition for which it is offered, and the citation to authority provided.

This, the 10th of July, 2025.

/s/ James F. Wyatt, III
James F. Wyatt, III
Counsel for Defendant Greg E. Lindberg